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**DOCUMENT REVIEW: PROPOSED PLAN AND DRAFT MODIFICATION OF  
COLORADO HAZARDOUS WASTE PERMIT FOR ROCKY FLATS PLANT  
OPERABLE UNIT 16: LOW PRIORITY SITES  
PUBLISHED: SEPTEMBER 19, 1993**

**GENERAL COMMENT**

1. The Environmental Protection Agency (EPA) requires the finding that "no action" is necessary to ensure adequate protection of human health and the environment, be supported by the baseline risk assessment or other information in the administrative record file (EPA, 1989, Guidance on Preparing Superfund Decision Documents). Although readers are directed to "No Further Action (NFA) Justification" document for detailed discussion, the nature of the data supporting the decision should be explained. It is recommended that a statement be included in the introduction section to indicate whether the preferred alternative is chosen based on verification of previous cleanup actions, and/or natural degradation processes through sampling, or based on analysis of historical records.
2. Descriptions of risks for some of the sites, such as Individual Hazardous Substance Site (IHSS) 185 and IHSS 115, are not supported by quantitative results and interpretations. Numerical representations of site risks, if available, should be summarized and explained in the text in order to convince the public of the NFA decision.

**SPECIFIC COMMENTS**

1. Page (p.) 1, second paragraph (para.), second sentence, first galley: The statement that this (No Action) alternative is preferred because potential risks to human health and the environment have been reduced is vague. Please revise the text to indicate that the current and potential risks to human health and ecological environment have been reduced below appropriate EPA standards.
2. SITE BACKGROUND, p. 3, second para., first bullet, first galley: Suggest that a sentence be added to indicate when the solvent spill occurred and when the remedial action was taken. Because the high volatilization rate is presented in "SUMMARY OF SITE RISKS" as a rationale for NFA, it would be necessary to provide the time of the events.
3. SUMMARY OF SITE RISKS, p. 4, third para., first bullet, first galley: The statement is made that because the spill occurred in a paved area, the wind dispersion and infiltration transport pathways are either not applicable, minimized, or eliminated. Please be more specific about the pathways by indicating which one is not applicable, which is minimized or eliminated, and where the supporting evidence for such results is recorded.

**ADMIN RECORD**

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4. SUMMARY OF SITE RISKS, p. 4, third para., third bullet, second galley: The statement "Amines could not be detected; no source of contamination is present" is in conflict with the statement "The concentration of amines in the steam condensate (0.135 mg/L) was: ..." Suggest deleting the last sentence.
5. SUMMARY OF SITE RISKS, p. 4, third para., fifth bullet, second galley: The text indicates that nickel carbonyl is highly volatile and readily decomposes in the presence of oxygen forming nickel oxide. The text discussed the effect of wind dispersion that disseminated nickel oxide particles. However, the possibility that nickel carbonyl enters surrounding soil and forms nickel oxide in the soil has not been discussed. The conclusion that there are no transport pathways for nickel oxide needs to be supported by more specific discussion on pathways.